

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	
)	Case No. 17-cr-00134 (WMW-DTS)
)	
Plaintiff,)	DEFENDANT’S PRETRIAL MOTION
)	FOR DISCLOSURE OF 404
v.)	EVIDENCE
)	
John Kelsey Gammell,)	
)	
)	
Defendant.)	

Defendant, John Kelsey Gammell, hereby moves the Court for an order directing the government to immediately disclose any “bad act” or “similar course of conduct” evidence it intends to offer at trial pursuant to Rule 404(b) of the Federal Rules of Evidence and specifically to identify which 404(b) evidence already produced it intends to introduce at trial. In addition, Mr. Gammell moves for an order directing the government to identify the witnesses through whom such evidence will be presented at trial.

Dated: August 18, 2017

By s/Rachel K. Paulose

Rachel K. Paulose
DLA Piper LLP (US)
Attorney ID No. 0280902
80 South Eighth Street, Suite 2800
Minneapolis, Minnesota 55402-2013
Telephone: 612.524.3008
Facsimile: 612.524.3001
rachel.paulose@dlapiper.com

ATTORNEY FOR DEFENDANT